

United States District Court  
for the  
Southern District of New York  
Related Case Statement

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Full Caption of Later Filed Case:

CITY OF MIAMI GENERAL EMPLOYEES  
& SANITATION EMPLOYEES  
RETIREMENT TRUST, derivatively on  
behalf of JPMorgan Chase & Co.

Plaintiff

Case Number

vs.

**1:23-cv-05459**

JAMES DIMON, STEPHEN B. BURKE,  
TODD A. COMBS, JAMES S. CROWN,  
TIMOTHY P. FLYNN, MELLODY HOBSON,  
JOHN W. KESSLER, PHEBE N.  
NOVAKOVIC, and JAMES E. STALEY

Defendant

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

Jane Doe 1, individually and on behalf of  
all others similarly situated

Plaintiff

Case Number

vs.

**1:22-cv-10019-JSR**

JP Morgan Chase Bank, N.A.,

Defendant

## Status of Earlier Filed Case:

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Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

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Open

(If so, set forth procedural status and summarize any court rulings.)

On May 1, 2023, the Court entered an order reconfirming its ruling granting in part and denying in part JP Morgan's motion to dismiss Doe's First Amended Complaint (Docket # 102). On May 24, 2023, the Court denied third-party defendant James ("Jes") Staley's motion to dismiss claims by JPMorgan. Discovery proceeded in May and June 2023 and settlement approval briefing began in June 2023.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

The newly-filed litigation and earlier-filed litigation arise from a common nucleus of operative fact related to Jeffrey Epstein's longstanding history as a client of JP Morgan, and JP Morgan's concealment of and/or failure to report Epstein's suspicious banking practices to regulators. The earlier-filed litigation asserts that JP Morgan facilitated, concealed, and/or enabled Epstein's abuse of Doe 1 and other victims. The newly-filed litigation seeks to hold the board of directors of JP Morgan liable for breaching their fiduciary duties by failing to properly oversee JP Morgan's relationship with Epstein and JP Morgan's compliance with applicable banking laws and regulations, and thereby allowing JP Morgan's misconduct related to Epstein to occur.

Signature: /s/ Mark Lebovitch

Date: 6/27/23

Firm: Bernstein, Litowitz, Berger & Grossmann